

REMARKS

Claims 23-31 and 33-44 are currently pending in the subject application and are presently under consideration. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 23-28, 34, and 44 Under 35 U.S.C. §102(e)

Claims 23-28, 34, and 44 stand rejected under 35 U.S.C. §102(e) as being anticipated by Grieshaber *et al.* (US 6,598,106). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Grieshaber *et al.* does not disclose, teach or suggest each and every limitation recited by the subject claims.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that “***each and every element*** as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (*quoting Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)) (emphasis added).

Applicants’ claimed subject matter relates to mechanisms to enable a user to define output behavior of an output device in a variety of status and/or event circumstances. The user creates a binding between a logical function and the status and/or event indicators. (*See Summary*). In particular, independent claim 23 recites *a system that facilitates generating a dynamic output in a state machine, comprising an input component that receives communication, the communication is related to at least one indicator that receives updated status/event information from the communication and a logic function component that defines a logical function using at least one function block and links the logical function with the indicator to define the behavior of an output and selectively provide an output signal according to the logic function and the at least one indicator*. Independent claim 44 recites similar limitations. Grieshaber *et al.* does not teach or suggest such novel aspects.

Rather Grieshaber *et al.* relates to a dual port enclosure monitor for servicing a dual port Small Computer System Interface (SCSI) bus. (*See Abstract*). The enclosure

monitor may communicate with hosts attached to the ports. The hosts can instruct the enclosure monitor to connect or isolate an internal SCSI bus, thus, allowing or disallowing access to SCSI devices attached to the internal SCSI bus. (See Summary). The internal SCSI bus is connected to the host *via* an external SCSI bus of the enclosure monitor. In one disclosed embodiment of Grieshaber *et al.*, the enclosure monitor continuously monitors the internal SCSI bus for errors. If an error is detected that hangs the internal SCSI bus, the enclosure monitor iteratively traverses the attached SCSI devices to determine the offending SCSI device so that it may be isolated. (See col. 9, line 49 to col. 10, line 27). Thus, Grieshaber *et al.* relates to detecting and isolating bus faults and is silent regarding a logic function component as recited by the subject claims. Grieshaber *et al.* detects a bus fault and takes steps to isolate the fault but does not disclose defining a logical function with at least one function block wherein the logical function is linked to an indicator to define output behavior. A bus error is not an indicator linked to (*i.e.* input to) a logical function to define output behavior or provide an output signal. Rather, the bus error triggers an iterative loop for isolating the faulting device, thus removing the error.

In view of at least the foregoing, it is readily apparent that the cited document does not disclose, teach or suggest each and every limitation of the claimed subject matter. Accordingly, this rejection should be withdrawn.

II. Rejection of Claim 35 Under 35 U.S.C. §103(a)

Claim 35 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Grieshaber *et al.* Withdrawal of this rejection is requested for at least the following reasons. Claim 35 depends from independent claim 23; and as stated *supra*, Grieshaber *et al.* does not disclose or suggest every limitation set forth in the subject independent claim. Accordingly, this rejection should be withdrawn.

III. Rejection of Claims 29-33 and 36-43 Under 35 U.S.C. §103(a)

Claims 29-33 and 36-43 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Grieshaber *et al.* in view of Tentij *et al.* (US 6,513,129). Withdrawal of this rejection is requested for at least the following reasons. Neither, Grieshaber *et al.*

nor Tentij *et al.*, alone or in combination, teach or suggest all the limitations recited in subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *See In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

In particular, the cited references fail to teach or suggest ***transmitting the input to a logic function, the logic function contains at least one function block, associating the at least one indicator with the at least one function block and providing an output based at least in part upon the at least one indicator and the logic function*** as recited by independent claim 36. As discussed *supra*, Grieshaber *et al.* relates to bus fault detection and isolation. Grieshaber *et al.* does not teach or suggest an association between an indicator and a function block and providing an output based in part on the indicator and the function block. Rather, Grieshaber *et al.* discloses an iterative fault isolation process triggered in response to a detected bus error.

In the subject Office Action, Tentij *et al.* is relied upon to make up for the deficiencies of Grieshaber *et al.* with respect to independent claim 36. However, Tentij *et al.* fails to teach or suggest those aspects lacking in Grieshaber *et al.* Tentij *et al.* relates to a fault management system wherein control objects can be selected for particular alarm incidents such that the selected control object is processed or executed in response to the alarm incident should it occur. (*See Abstract*). Thus, Tentij *et al.* is similar to Grieshaber *et al.* in that a particular routine is executed in response to a detected fault. Tentij *et al.* does not teach or suggest an association between an indicator

and a function block and providing an output based in part on the indicator and the function block. Rather, Tentij *et al.* enables a user of the fault management system to select a fault recovery routine that will execute upon detection of a fault. Therefore, Tentij *et al.* fails to cure the deficiencies of Grieshaber *et al.* with respect to the subject claims.

Moreover, the combination of Grieshaber *et al.* and Tentij *et al.*, if possible, would not result in applicants' claimed invention. Rather, the result would be a configurable fault management system for a dual port enclosure monitor servicing a dual port SCIS bus. In particular, a user of the enclosure monitor would be able to alter the fault detection response from the iterative traversal of attached devices as discussed *supra* to some other routine that triggers in response to a detected fault. Thus, such a combination does not teach or suggest all limitations of the claimed subject matter.

Claims 29-33 depend from independent claim 23. As stated *supra*, Grieshaber *et al.* does not disclose, teach or suggest every limitation set forth in the subject independent claim, and Tentij *et al.* fails to cure the deficiencies. Therefore, the rejection of claims 29-33 should be withdrawn and the claims allowed.

In view of the foregoing, it is readily apparent that Grieshaber *et al.* and Tenji *et al.*, taken alone or in combination, fail to teach or suggest every aspect of the claimed subject matter. Accordingly, withdrawal of this rejection is respectfully requested.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063[ALBRP173USA].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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